



04-200138599 ✓

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

**JUN 15 2016**

CERTIFIED MAIL 7014 2870 0000 3318 3135  
RETURN RECEIPT REQUESTED

Mr. Thomas Wiseman  
Public Works Superintendent  
City of Arlington  
P.O. Box 507  
Arlington, Tennessee 38002

Re: Notice of Violation No.: 309-2016-11  
Information Request pursuant to 308 of the Clean Water Act  
National Pollutant Discharge Elimination System Permit No.: TN0078603  
Arlington Sewage Treatment Plant

Dear Mr. Wiseman:

Pursuant to Section 309(a)(1) of the Clean Water Act (CWA), 33 U.S.C. § 1319(a)(1), the United States Environmental Protection Agency hereby notifies the City of Arlington (the City) that it has violated its National Pollutant Discharge Elimination System (NPDES) Permit No.: TN0078603 for the Arlington Sewage Treatment Plant (the Plant). Specifically, the City's Plant has violated, Total Suspended Solids, Total Ammonia Nitrogen, Dissolved Oxygen, Suspended Solids (Percent Removal), and Carbonaceous BOD as listed in the Enclosure.

The EPA requests, pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, that the City provide a written explanation of the reasons for each of the aforementioned violations, and any other effluent violations that may have occurred from January 1, 2016, to the present, and provide a summary of actions taken or planned by the City to correct the problems and prevent future violations. In instances where the actions are planned, please include a schedule for completing the actions.

The City must submit this information within 30 days of receipt of this correspondence. The submittal must be addressed to:

Ms. Connie Raines  
U.S. Environmental Protection Agency, Region 4  
NPDES Permitting and Enforcement Branch  
Atlanta Federal Center  
61 Forsyth Street, S.W.  
Atlanta, Georgia 30303-8960

The State of Tennessee is being concurrently notified of these findings. The EPA is coordinating with the State to ensure that timely and appropriate enforcement action is taken and compliance with the conditions of the Permit is achieved.

If these violations are not resolved in a timely or appropriate manner, and/or the City fails to respond to the Information Request, the EPA may take enforcement action, which may include issuance of an administrative order, assessment of administrative penalties or initiation of a civil judicial action pursuant to Section 309 of the CWA, 33 U.S.C. §1319.

If you have questions regarding this notice and information request, please contact Ms. Connie Raines at (404) 562-9671 or via email at [Raines.Connie@epa.gov](mailto:Raines.Connie@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "J. D. Giattina", with a stylized flourish extending to the right.

James D. Giattina  
Director  
Water Protection Division

Enclosure

cc: Ms. Tisha Calabrese Benton  
Tennessee Department of Environment and Conservation

# DMR Summary

\*\*\* Region 4 Certified \*\*\*

1/1/2012 12:00:00 AM to 3/31/2016 12:00:00 AM

## Permit TN0078603

Permit Name	Version Nbr	Curr. Major Minor Status	Issue Date	Effective Date	Expiration Date
ARLINGTON STP	0	Major	12/1/12	1/1/13	11/30/17

Version # 0

Outfall 001G

### 00530 Solids, total suspended / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
1/1/13	11/30/17	COMPOS	Five per Week

Limit				
Limit Unit Desc	Pounds per Day	Milligrams per Liter	Milligrams per Liter	Milligrams per Liter
Statistical Base	WKLY AVG	MO AVG	WKLY AVG	DAILY MX
Limit Value	834	30	40	45
DMR Values				
2/28/14	120	120	120	120
2/28/14	49	49	49	49
3/31/14	66	66	66	66
4/30/14	32	32	32	32
4/30/14	61	61	61	61
4/30/14	90	90	90	90
5/31/14	132	132	132	132
6/30/14	38	38	38	38
6/30/14	57	57	57	57
6/30/14	87	87	87	87
7/31/14	76	76	76	76
8/31/14	120	120	120	120
8/31/14	57	57	57	57
9/30/14	58	58	58	58
10/31/14	75	75	75	75
2/28/15	61	61	61	61
4/30/15	173	173	173	173
4/30/15	51	51	51	51
4/30/15	88	88	88	88
4/30/15	893	893	893	893
8/31/15	101	101	101	101
8/31/15	39	39	39	39
8/31/15	406	406	406	406
9/30/15	47	47	47	47
9/30/15	76	76	76	76
11/30/15	61	61	61	61

### 00610 Nitrogen, ammonia total [as N] / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
1/1/13	11/30/17	COMPOS	Five per Week

Limit					
Limit Unit Desc	Pounds per Day	Pounds per Day	Milligrams per Liter	Milligrams per Liter	Milligrams per Liter
Statistical Base	MO AVG	WKLY AVG	MO AVG	WKLY AVG	DAILY MX
Limit Value	104	156	5	8	10
DMR Values					
3/31/14	10.4	10.4	10.4	10.4	10.4

# DMR Summary

\*\*\* Region 4 Certified \*\*\*

1/1/2012 12:00:00 AM to 3/31/2016 12:00:00 AM

Permit TN0078603

Version # 0

Outfall 001G

00610 Nitrogen, ammonia total [as N] / Location 1 / Season 0 / Base

DMR Values					
8/31/14	11	11	11	11	11
8/31/14	5.56	5.56	5.56	5.56	5.56
9/30/14	118	118	118	118	118
9/30/14	21	21	21	21	21
9/30/14	216.7	216.7	216.7	216.7	216.7
9/30/14	9.97	9.97	9.97	9.97	9.97
10/31/14	11.2	11.2	11.2	11.2	11.2
10/31/14	20.3	20.3	20.3	20.3	20.3
10/31/14	6.5	6.5	6.5	6.5	6.5
3/31/15	13.9	13.9	13.9	13.9	13.9
4/30/15	11.79	11.79	11.79	11.79	11.79
4/30/15	117.9	117.9	117.9	117.9	117.9
4/30/15	13.2	13.2	13.2	13.2	13.2
4/30/15	19.1	19.1	19.1	19.1	19.1
5/31/15	10.2	10.2	10.2	10.2	10.2
5/31/15	13.2	13.2	13.2	13.2	13.2
5/31/15	156.9	156.9	156.9	156.9	156.9
5/31/15	21.2	21.2	21.2	21.2	21.2
8/31/15	11.2	11.2	11.2	11.2	11.2
8/31/15	9.11	9.11	9.11	9.11	9.11
9/30/15	14.33	14.33	14.33	14.33	14.33
9/30/15	20.7	20.7	20.7	20.7	20.7
9/30/15	8.02	8.02	8.02	8.02	8.02
10/31/15	13.85	13.85	13.85	13.85	13.85
10/31/15	14	14	14	14	14
10/31/15	5.94	5.94	5.94	5.94	5.94
2/29/16	11.31	11.31	11.31	11.31	11.31
2/29/16	118	118	118	118	118
2/29/16	15.2	15.2	15.2	15.2	15.2
2/29/16	156.3	156.3	156.3	156.3	156.3
2/29/16	17.7	17.7	17.7	17.7	17.7
3/31/16	114	114	114	114	114
3/31/16	11.5	11.5	11.5	11.5	11.5
3/31/16	17.8	17.8	17.8	17.8	17.8
3/31/16	266	266	266	266	266
3/31/16	7.43	7.43	7.43	7.43	7.43

00610 Nitrogen, ammonia total [as N] / Location P / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
1/1/13	11/30/17	COMPOS	Five per Week

Limit	
Limit Unit Desc	Pounds per Day
Statistical Base	DAILY MX
Limit Value	208
DMR Values	
9/30/14	702.5
5/31/15	268.9
2/29/16	249
3/31/16	511

# DMR Summary

\*\*\* Region 4 Certified \*\*\*

1/1/2012 12:00:00 AM to 3/31/2016 12:00:00 AM

Permit TN0078603

Version # 0

Outfall 001G

00610 Nitrogen, ammonia total [as N] / Location P / Season 0 / Base

31648 E. coli, MTEC-MF / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
1/1/13	11/30/17	GRAB	Five per Week

Limit		
Limit Unit Desc	Number per 100 Milliliters	Number per 100 Milliliters
Statistical Base	MO GEOMN	DAILY MX
Limit Value	126	941
<b>DMR Values</b>		
1/31/14	2200	2200
2/28/14	2400	2400
3/31/14	6000	6000
4/30/14	142	142
4/30/14	20000	20000
5/31/14	5500	5500
7/31/14	2420	2420
8/31/14	2420	2420
9/30/14	2420	2420
12/31/14	1300	1300
1/31/15	1120	1120
2/28/15	2420	2420
3/31/15	2420	2420
4/30/15	2420	2420
5/31/15	2420	2420
6/30/15	2420	2420
7/31/15	2420	2420
8/31/15	2420	2420
9/30/15	2420	2420
10/31/15	1120	1120
1/31/16	1300	1300
2/29/16	2420	2420
3/31/16	2420	2420

80082 BOD, carbonaceous [5 day, 20 C] / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
1/1/13	11/30/17	COMPOS	Five per Week

Limit		
Limit Unit Desc	Milligrams per Liter	Milligrams per Liter
Statistical Base	WKLY AVG	DAILY MX
Limit Value	35	40
<b>DMR Values</b>		
4/30/15	37.7	37.7
4/30/15	65	65
8/31/15	88	88
2/29/16	41	41
2/29/16	62	62

# DMR Summary

\*\*\* Region 4 Certified \*\*\*

1/1/2012 12:00:00 AM to 3/31/2016 12:00:00 AM

Permit TN0078603

Version # 0

Outfall 001G

81011 Solids, suspended percent removal / Location K / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
1/1/13	11/30/17	CALCTD	Five per Week

Limit		
Limit Unit Desc	Percent	Percent
Statistical Base	DAILY MN	MO AV MN
Limit Value	40	85
DMR Values		
2/28/14	27	27
3/31/14	10	10
3/31/14	75.1	75.1
4/30/14	39	39
4/30/14	76.3	76.3
5/31/14	84.6	84.6
6/30/14	78	78
8/31/14	34	34
12/31/14	28	28
2/28/15	21	21
2/28/15	84	84
3/31/15	0	0
3/31/15	66	66
4/30/15	0	0
4/30/15	36.1	36.1
6/30/15	75.9	75.9
7/31/15	80.6	80.6
8/31/15	0	0
8/31/15	73.3	73.3
9/30/15	0	0
9/30/15	59.5	59.5
11/30/15	33	33
1/31/16	13	13
1/31/16	73.2	73.2
2/29/16	37	37
2/29/16	67.9	67.9



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

JUN 15 2016

CERTIFIED MAIL 7014 2870 0000 3318 3142  
RETURN RECEIPT REQUESTED

Ms. Tisha Calabrese Benton  
Director, Water Pollution Control  
Tennessee Department of Environment  
and Conservation  
401 Church Street, 6<sup>th</sup> Floor, L&C Annex  
Nashville, Tennessee 37243 -0435

Re: Notice of Violation No.: 309-2016-11  
National Pollutant Discharge Elimination System Permit No.: TN0078603  
Arlington Sewage Treatment Plant

Dear Ms. Benton:

Pursuant to Section 309(a)(1) of the Clean Water Act, 33 U.S.C. § 1319(a)(1), the U. S. Environmental Protection Agency Region 4, has determined that the City of Arlington (City) is in violation of its National Pollutant Discharge Elimination System Permit No.: TN0078603 (Permit) for the Arlington Sewage Treatment Plant and has violated, at a minimum, effluent requirements for the parameters summarized here: Total Suspended Solids, Total Ammonia Nitrogen, Dissolved Oxygen, Suspended Solids (Percent Removal), and Carbonaceous BOD. The EPA is simultaneously notifying the City of these findings through the issuance of a Notice of Violation (NOV). A copy of the NOV to the City is enclosed for your convenience and record.

If the State of Tennessee (State) commences appropriate action within 30 days of receipt of this letter to ensure that the City achieves expeditious compliance with its Permit, additional involvement by the EPA may not be required. However; if the State does not take such action, the EPA may then take the necessary steps to require the City to come into compliance. Please advise the EPA within 15 days of receipt of this letter of the action(s) you plan to take in this matter to ensure that the City achieves expeditious compliance with its Permit requirements. If a formal enforcement action is taken, please provide a copy of the applicable documents for our records.

If you have questions regarding this notice, please feel free to contact Ms. Alenda Johnson at (404) 562-9761 or by e-mail at [johnson.alenda@epa.gov](mailto:johnson.alenda@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Giattina', with a stylized flourish at the end.

James D. Giattina  
Director  
Water Protection Division

Enclosure